



Josh Bernstein, P.C.

Civil Rights & Employment Law

Josh Bernstein, P.C.  
188 Grand St., 2<sup>nd</sup> Fl.  
New York, NY 10013

(Phone) (646) 308-1515  
(Fax) (718) 679-9517  
jbernstein@jbernsteinpc.com

April 15, 2022

**RE: Request for Brief Extension of Time to Submit  
Pre-Initial Conference Statement**

**MEMO ENDORSED**

The Honorable Barbara Moses  
United States District Court, Southern District of New York  
500 Pearl St., Room 740  
New York, NY 10007

*Rhuland Davis v. Metro North Commuter Railroad et. al.*, No. 21-cv-00387

Judge Moses,

I represent Plaintiff Rhuland Davis in the above-captioned matter and write with the consent of opposing counsel to request a brief extension of the deadline for submission of the pre-conference statement in connection with the initial conference scheduled in this matter for April 28, 2022.

The existing deadline for the pre-conference statement is April 21, 2022. The parties request an extension to April 26, 2022. The reason for the request is that the undersigned counsel has just recently been retained by Plaintiff, and as a result the scheduled meet-and-confer to hash out the pre-conference statement that was to be had between then-pro se Plaintiff and counsel for Defendants was postponed so that the meet-and-confer and drafting of the statement itself could be conducted by counsel instead, and counsel for Defendants is currently on vacation and will not return until April 22, 2022.

Thank you for your attention to this matter.

Application GRANTED. The deadline to file the pre-conference statement is extended to **April 26, 2022**, at 5:00pm. SO ORDERED.

Barbara Moses  
United States Magistrate Judge  
April 18, 2022

Very truly yours,

/s/

Joshua Alexander Bernstein